

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
DES MOINES DIVISION**

**MAHARISHI FOUNDATION
USA, INC.**

Plaintiffs,

vs.

**THE VEDA CENTER, LLC,
THOMAS KNOLES, AND THE
MEDITATION HOUSE, LLC**

Defendant.

No. 4:11-cv-562

**FIRST AMENDED AND
SUBSTITUTED COMPLAINT
(CORRECTED)**

Plaintiff MAHARISHI FOUNDATION USA, INC. (the “Foundation”), for its First Amended and Substituted Complaint against Defendants The Veda Center, LLC (“The Veda Center”) Thomas Knoles (“Knoles”), and The Meditation House, LLC (“The Meditation House”), states:

JURISDICTION AND VENUE

1. The Foundation is a corporation organized under the laws of the state of Massachusetts with its principal place of business in Fairfield, Iowa.
2. The Veda Center is a limited liability company organized under the laws of the State of Arizona with its principal place of business in Flagstaff, Arizona.
3. On information and belief, Defendant Thomas Knoles is a resident of Flagstaff, Arizona.

4. The Meditation House is a limited liability company organized under the laws of the State of Iowa with its principal place of business in Ankeny, Iowa.
5. This Court has subject matter jurisdiction over the Foundation's federal claims pursuant to 15 U.S.C. § 1121(a) and 28 U.S.C. §§ 1331 and 1338, involving allegations of violations of the Lanham Act §§ 32 and 43, 15 U.S.C. § 1114 and 15 U.S.C. § 1125, respectively. The Court has supplemental jurisdiction over the remaining claims pursuant to 28 U.S.C. §1367(a).
6. Venue is proper pursuant to the provisions of 28 U.S.C. §§ 1391(b) and (c) in that the events giving rise to the claim occurred in the Southern District of Iowa, and Defendants The Veda Center, Thomas Knoles, and The Meditation House, LLC are subject to personal jurisdiction in this Court.

FACTUAL ALLEGATIONS

7. The Foundation is a non-profit educational organization that promotes and provides instruction in the Transcendental Meditation® technique (also known as TM®) through trained certified instructors and encourages scientific research into the efficacy of the TM technique.
8. In the past five decades, approximately one million people have learned the TM technique from one of the more than one hundred TM centers around the United States.
9. The TM technique is based on a meditation technique that can be traced back to ancient India's Veda period. In the mid to late 1950s, a person widely known as

Maharishi Mahesh Yogi took the knowledge he gained from practicing this type of meditation and developed a precise system for teaching this meditation technique to a wide audience in a carefully supervised, controlled, consistently reproducible manner. Maharishi Mahesh Yogi coined the system he created the Transcendental Meditation or TM technique.

10. Maharishi Mahesh Yogi encouraged the founding of many organizations around the world to teach and promote the TM technique.
11. A person learns the Transcendental Meditation technique over the course of four days. On the first day, the student receives personalized instruction by a certified teacher, including receipt of a mantra and guidance on how to properly use the mantra to meditate. Thereafter, students are encouraged to meditate 20 minutes twice a day.
12. Following the first day of instruction are three days of courses and lessons designed to advance the student's knowledge and experience. The class generally begins with the students filling out a questionnaire specifically worded to encourage the students to reflect on their prior meditation sessions and give the instructor insight into how each student is progressing in their instruction. The remainder of the class includes a discussion on the students' cumulative experience during their meditation sessions and the subtleties of the TM technique. The discussion is enhanced with videos of Maharishi Mahesh Yogi explaining his experience with meditating and conveying his opinions as to the proper practice of the TM technique.

13. After the four-day course is finished, the Foundation provides support services to the students for the rest of their lives. A 4-6 month intensive follow-up course follows the four-day course and continues with lifelong support. The student has access to personal one-on-one checking of their mediation practice by a certified teacher. During these sessions, the teacher guides the student through the process of effortless meditation to solidify the correct practice of the TM technique. The student also has access to meetings and group meditation at any one of the one hundred TM centers around the country.
14. The students have lifelong access to exclusive resources provided by the Foundation, including special events and speakers, a magazine subscription, news reports, and emails containing matters of interest including press releases, events, and new research.
15. A refresher course in the TM technique is offered to all students to encourage lifelong learning and practicing of the TM technique. The refresher course is a comprehensive review of the four-day TM course, recommended for those who don't practice regularly.
16. The extensive follow-up program is provided to encourage a life-long practice of the TM technique. Regular practice of the TM technique is crucial for obtaining the scientifically proven health benefits associated with practicing the TM technique.
17. Those who desire to learn how to teach the TM technique attend an extensive and rigorous teacher-training course. The course is taught by teachers trained to

teach others how to teach the TM technique, and involves extensive use of videos of Maharishi Mahesh Yogi explaining the subtleties of the TM technique. Those who teach the TM technique are required to memorize specific words and phrases that Maharishi Mahesh Yogi found effective to communicate the subtleties of properly practicing the TM technique.

18. The teacher-training course is continually updated and refined with new teaching material, research, and videos.
19. The Foundation authorizes those who have completed the teacher-training course to teach the TM technique under the Transcendental Meditation trademark in the United States.
20. Certified teachers of the TM technique receive ongoing guidance from the Foundation, which includes advanced seminars and continued support.
21. Certified teachers of the TM technique must also attend a re-certification class to ensure that their knowledge is current and that the teaching techniques utilized meet requirements.
22. The extensive quality control procedures that the Foundation has adopted, including the use of videos of Maharishi Mahesh Yogi to convey his knowledge to teacher-candidates, the control over the words and phrases teachers use to teach the TM technique, and the re-certification requirement ensure that all of those who teach the TM technique do so in a consistent manner. This way, the Foundation can ensure that people who learn the TM technique from different teachers in different parts of the United States are learning the same thing and in

the same way. Those quality control procedures are an integral component of the TM's "brand".

23. The TM technique has been the subject of more than 600 scientific studies conducted at 250 universities and medical schools in 33 countries. Research has been conducted from such notable medical schools as Harvard, Stanford, UCLA, University of Chicago, University of Michigan, University of Virginia, and Yale. These scientific studies have verified a wide range of health and other benefits from the TM technique, including reduction in stress, lower blood pressure and improved blood glucose and insulin levels.
24. The subjects of these research studies are uniformly students who have been trained in the TM technique by a teacher certified by the Foundation. The funding obtained by such scientific studies on the TM technique is used to compensate certified TM teachers to teach the TM technique to the subjects of those particular scientific studies. This means that when the results of a scientific study show that practicing the TM technique can, for example, lower blood pressure or improve blood glucose and insulin levels, the subjects of study are practicing an identical meditation technique as taught in any one of the hundreds of TM centers around the country.
25. The Foundation is the owner of numerous common law and federally registered trademarks and service marks, and the goodwill symbolized therein, including as the exclusive licensee of United States Trademark Registration No. Reg. No. 1,082,923 to Transcendental Meditation federally registered on the Principal

Register maintained by the United States Patent and Trademark Office (the "Trademark Office"). On April 2, 1984, the Trademark Office acknowledged an affidavit filed under Lanham Act § 15, 15 U.S.C. § 1065, for incontestable status for the Transcendental Meditation trademark, which provides conclusive evidence of the validity of this trademark. The licensor and owner of the mark is Maharishi Foundation, LTD., a corporation organized under the laws of the United Kingdom, which, pursuant to an exclusive license agreement, granted all rights under the mark in the United States to the Foundation, including, without limitation, the right to enforce the mark. A true and correct copy of the registration is attached as Exhibit A.

26. The Transcendental Meditation trademark has been continuously and substantially exclusively used in commerce for educational services since at least 1966. The rights supported by such long and continuous use of the Transcendental Meditation mark, by the Foundation, its predecessors in interest, and its licensees, and goodwill associated therewith inure to the benefit of the Foundation and the Maharishi Foundation, LTD.
27. The Foundation has extensively promoted and advertised its services under the Transcendental Meditation trademark to identify its educational services and to distinguish its services from similar services offered by other companies and individuals, by, and without limitation, prominently displaying the Transcendental Meditation trademark in promotional and advertising materials distributed throughout the United States. The Foundation's services provided

under the Transcendental Meditation mark are provided nationwide including in the State of Iowa.

28. As a result of the extensive promotion and advertising of the services under the Transcendental Meditation trademark, and as evidenced by the incontestable registration, the Transcendental Meditation trademark has become well-known and widely accepted and respected by the relevant public and in the medical field. As a further result of such promotion and advertising, and as evidenced by the registration, the Transcendental Meditation trademark is highly distinctive, identifying educational services emanating only from the Foundation and symbolizing valuable goodwill.
29. As a further result of the Foundation's extensive promotion and advertising of its services, the relevant public has come to associate Maharishi Mahesh Yogi's name and likeness with the Foundation and the Transcendental Meditation technique.
30. The Foundation's Transcendental Meditation trademark is famous in the United States, in Iowa, and throughout the world. Such fame is evidenced by the numerous celebrity endorsements and spokespersons, and the millions of people around the world who recognize the Transcendental Meditation technique and uniquely associate the services offered by the Foundation with the Transcendental Meditation trademark. Through widespread and favorable public acceptance and recognition, this trademark enjoys tremendous goodwill

and has become an asset of incalculable value as symbols of the Foundation's services.

**Defendants The Veda Center and Thomas Knoles'
Wrongful Conduct**

31. On information and belief, Thomas Knoles owns, operates and controls The Veda Center, which he uses to promote, advertise, and sell his meditation services throughout the United States.
32. Defendant Knoles learned the TM technique on October 9, 1970 under the instruction of Robert Cranston, an authorized instructor of the TM technique.
33. Prior to his instruction in the TM technique, Mr. Knoles signed an enrollment form. A copy of Mr. Knoles' enrollment form is attached as Exhibit B.
34. Mr. Knoles became a teacher of the TM technique on or about December 22, 1972.
35. In consideration for Mr. Knoles' training and authorization to teach the TM technique, Mr. Knoles solemnly pledged the following:

It is my privilege, Maharishi, to promise to teach the Principles and Practice of Transcendental Meditation only as a teacher—employee of SIMS which accepts me as such; that I will always hold the teaching in trust for you, dear Maharishi and SIMS; that I will never use the teaching except as a teacher in SIMS or other organizations founded by you for the purpose of carrying on your work of spreading Transcendental Meditation for the good of Mankind.

A copy of Mr. Knoles' teacher-training agreement is attached as Exhibit C.

36. Mr. Knoles also acknowledged that after having been trained in how to teach the TM technique that:

Prior to receiving the training I had no prior knowledge of such system of Teaching; that there is no other available source where the knowledge of

such teaching may be obtained; that such teaching has been imparted to me in trust and confidence; that such training is secret and unique.

37. Mr. Knoles further promised to Maharishi Mahesh Yogi in consideration for being trained and authorized to teach the TM technique that he would, “always work within the framework of the Organizations founded by Maharishi.”
38. Mr. Knoles lived and taught the TM technique in Australia under or in association with the World Plan Executive Council of Australia, Ltd., an organization that promotes the teaching of the TM technique in Australia, until his departure from this organization in 1997.
39. Mr. Knoles remained in Australia after his disassociation with World Plan Executive Council of Australia, Ltd. for several years teaching meditation.
40. Mr. Knoles later expanded his teaching services to the United States and started training others in the United States how to teach his meditation technique. Those students of Mr. Knoles, thereafter, started teaching others how to teach Mr. Knoles’ meditation technique.
41. Mr. Knoles’ entire concept in teaching his meditation services is based on wholesale appropriation of the Transcendental Meditation technique, including the systems and methods by which teachers are trained and students are taught, and appropriation of Maharishi Mahesh Yogi’s name and likeness. In so doing, Mr. Knoles seeks to profit from the goodwill and worldwide recognition of the Transcendental Meditation technique and Maharishi Mahesh Yogi’s worldwide fame and association with the TM technique.

42. Defendant Knoles' website promoting his meditation services at www.thomknoles.com made use of the Transcendental Meditation mark to refer to services provided by Mr. Knoles and attributed the number of scientific studies on the TM technique to Vedic Meditation. A demand letter was sent to Mr. Knoles on December 19, 2005 regarding his unauthorized use in the United States of the "Transcendental Meditation" trademark and his false representations. A copy of this demand letter is attached as Exhibit D. Furthermore, in an Affidavit, Mr. Knoles readily admitted using the Transcendental Meditation trademark until 2005 to refer to the type of meditation he taught. A copy of Mr. Knoles' Affidavit is attached as Exhibit E.
43. Mr. Knoles responded to the demand letter by stating that he would completely dissociate his teachings from the Foundation and correct his website. A copy of Mr. Knoles' response is attached as Exhibit F.
44. On information and belief, Mr. Knoles, in response to the demand letter, included the following disclaimer on his website: "Thomas Knoles and Will Dalton expressly disclaim any association with Maharishi Foundation Ltd (a corporation with limited liability), its programs, its methods, its trademark "Transcendental Meditation"(the common words "transcendental" and "meditation" as defined in Webster's Dictionary but given an initial capital) and its licensees."

45. On information and belief, Mr. Knoles began referring to his type of meditation as "Vedic Meditation" in 2005 after receipt of and in direct response to the demand letter attached as Exhibit D.
46. Despite Mr. Knoles' agreement to disassociate his services with those offered by the Foundation under the Transcendental Meditation trademark, Mr. Knoles has engaged in a calculated effort to associate himself and his teachings with the Foundation's services and to render the Transcendental Meditation mark generic. For example, Mr. Knoles claims that "He learned Vedic Meditation from Maharishi Mahesh Yogi," the creator of the TM technique and founder of the Foundation's predecessor in interest. A copy of Mr. Knoles' online biography is attached as Exhibit G.
47. Mr. Knoles falsely claims that Maharishi Mahesh Yogi was his mentor over two decades and that Maharishi Mahesh Yogi personally instructed him in the TM technique, when, in fact, he was taught by Robert Cranston. Mr. Knoles also claims that Maharishi Mahesh Yogi personally conferred to him an honorary doctorate, Doctor of Science of Creative Intelligence, from Maharishi European Research University in Switzerland. That claim is false.
48. On information and belief, Mr. Knoles readily tells his students that the type of meditation taught by the Foundation and known widely as the Transcendental Meditation technique is the same type of mediation with the same origins as Vedic Meditation. For example, Jules Green stated under oath that Mr. Knoles informed her that the type of mediation he teaches is the same, and has been

referred to by him by the terms “Transcendental Meditation” and “Vedic Meditation.” Unsurprisingly, persons trained by Mr. Knoles to teach the Vedic Meditation technique similarly equate their services offered under the Vedic Meditation trademark with those offered by the Foundation under the Transcendental Meditation trademark.

Defendant The Meditation House’s Wrongful Conduct

49. The Meditation House promotes and teaches the Vedic Meditation technique, which it claims is the same type of meditation instruction taught by the Foundation with the same scientifically proven health benefits.
50. The Meditation House also claims that scientific studies conducted at over 200 research institutes and universities support the health benefits attributed to Vedic Meditation and its claims to health benefits have been proven by science in over 600 published scientific research studies.
51. More specifically, The Meditation House, claims that “[a]ccording to scientific studies conducted at over 200 research institutes and universities, a few minutes of Vedic Meditation each day produces a wide range of health benefits” A highlighted copy of The Meditation House’s Vedic Meditation webpage is attached as Exhibit H.
52. According to The Meditation House, there are several notable health benefits attributed to the practice of the Vedic Meditation technique, including “reduced risk of heart disease” and “normalization of blood pressure.” A highlighted

copy of The Meditation House's webpage in which it answers frequently asked questions about its meditation program is attached as Exhibit I.

53. The Meditation House also advertises that, its "claims have been proven by science" in "over 600 published scientific research studies" This claim is highlighted in Exhibit I.
54. The Meditation House brings Vedic Meditation teachers trained by Mr. Knoles from California to Iowa to provide instruction in the Veda Meditation technique to students of The Meditation House.
55. On information and belief, the Vedic Meditation teachers trained by Mr. Knoles similarly claim to teach the same type of meditation instruction taught by the Foundation with the same scientifically proven health benefits.

Summary

56. The Defendants' claims are false. The Transcendental Meditation technique is a proprietary form of meditation taught by the Foundation and its authorized licensees. By virtue of its federally registered "incontestable" trademark, only those licensed by the Foundation may teach the Transcendental Meditation technique or use the mark to describe those services. Throughout more than five decades of continuous and substantially exclusive use, the Foundation has built up considerable and valuable goodwill in the Transcendental Meditation trademark making it highly distinctive of a unique form of meditation taught only by the Foundation.

57. The Foundation's connection with Mr. Knoles was severed more than fifteen years ago.
58. Mr. Knoles is not subject to the Foundation's efforts to control the quality of the services offered under the Transcendental Meditation trademark.
59. Mr. Knoles does not have lawful access to the Foundation's course material used to teach others how to practice the TM technique nor to teach others how to teach the TM technique.
60. Mr. Knoles has not taken the Foundation's re-certification class. Nor have any of the teachers of Mr. Knoles' Vedic Meditation techniques.
61. Because Mr. Knoles is not subject to the Foundation's quality control, cannot lawfully use the Foundation's course material to teach or teach others the TM technique, and has not taken the Foundation's re-certification class, Mr. Knoles' Vedic Meditation technique cannot be the same as the Foundation's Transcendental Meditation technique no matter how superficially similar the respective techniques may appear to be.
62. The Defendants' claim that the Transcendental Meditation and the Veda Mediation services are equivalent is based on a self-serving desire to appropriate the valuable goodwill associated with the Foundation's brand for their own commercial gain.
63. Contrary to the express representations by Defendants, there is no research supporting the Vedic Meditation technique. On information and belief, not a single scientific study has been conducted on practitioners of the Veda Mediation

technique nor is there a single published scientific study that supports the Defendants' claims.

64. The Defendants' claims of scientific support and published research were copied from the Foundation's literature based on Defendants' self-serving belief that the parties' respective services are equivalent, and, thus, research regarding one is and must be applicable to the other. There is, however, no objective support for Defendants' claim that the parties' respective services are identical.
65. The Defendants' claims are literally false on their face in several ways: (i) There has been no scientific research on the Defendants' Vedic Meditation technique; (ii) There are no published scientific studies on the Vedic Meditation technique; and (iii) There is no scientific evidence that shows that the Vedic Meditation program reduces the risk of heart disease and normalizes blood pressure.
66. The Defendants' claims convey a false impression that there has been scientific research on the Vedic Meditation technique, that there are published scientific studies on Vedic Meditation, and that there is scientific evidence that shows that the Vedic Meditation program reduces the risk of heart disease and normalizes blood pressure, among other attributes.
67. Whether a meditation technique has been the subject of scientific studies documented in published research, and whether scientific studies supports specific health claims, all are highly material to a consumer's decision to purchase services in the form of instruction in a meditation technique.

68. On information and belief, consumers have been deceived and are likely to be deceived by the Defendants' deliberate, willful, and intentionally false claims concerning the scientific support for the services described in their advertisements and promotional materials.
69. On information and belief, consumers have been deceived and are likely to be deceived by the Defendants' deliberate, willful, and intentionally false claims concerning the health benefits attributed to the services, including a reduced risk of heart disease and normalization of blood pressure described in their advertisements.
70. The Defendants' false advertising misleads consumers and damages the Foundation: The Defendants' false advertisements and promotional materials divert customers from the Foundation to the Defendants who provide a competing form of services. The Foundation is losing consumers because the Defendants' false advertisements mislead consumers into believing that their Vedic Meditation technique is the same as the Transcendental Meditation technique and is scientifically proven to yield the same notable health benefits.
71. The Defendants are representing to their customers that their Vedic Meditation program is equivalent to or the same as the services provided by the Foundation under the Transcendental Meditation trademark.
72. The Defendants have intentionally adopted, advertised, and used the Transcendental Meditation trademark in connection with the promotion and sale of their education services.

73. The Defendants deliberately, willfully, and intentionally adopted, advertised, and used the Transcendental Meditation trademark in connection with the promotion and sale of their education services.
74. The Defendants have advertised and promoted their businesses and services in a manner calculated to confuse, or to cause mistake, or to deceive the public into believing that the Defendants' services are identical to the services provided by the Foundation.
75. Defendants' actions could lead the general public into believing the Foundation's Transcendental Meditation trademark refers primarily to a genus of services, thereby rendering the Transcendental Meditation trademark generic and destroying its origin-identifying function.
76. The Defendants' advertising and promotional practices have misled and deceived – or are likely to mislead and deceive – the public.
77. The Defendants have advertised and promoted their businesses and services in a manner calculated to call to mind the Transcendental Meditation trademark and to create the false impression that the Defendants' business and services are affiliated, connected, or associated with the Foundation or that Defendants have the sponsorship or approval of the Foundation. The public has been or is likely to be misled or deceived by the false impression arising from the Defendants' usage of the Transcendental Meditation mark.

78. The Defendants' advertisement and promotion of their businesses and services under the Transcendental Meditation trademark are likely to cause confusion, mistake, and deception as to the source and origin of the Defendants' services.
79. Through substantial efforts, the Foundation has attempted to obtain agreement of the Defendants Thomas Knoles and The Meditation House to cease their false advertising. Such efforts have been unsuccessful.
80. The Defendants continued infringement demonstrates a willful and bad faith intent to create confusion, deception, and mistake in the minds of Defendants' potential customers and to trade on the Foundation's goodwill by implying a connection or relationship between the Defendants' and the Foundation's respective services. As a result of the conduct of the Defendants, the Defendants have been and will continue to be unjustly enriched.
81. The Defendants' unauthorized use of the Transcendental Meditation trademark is likely to dilute and blur the distinctive quality of the Foundation's Transcendental Meditation trademark, and to tarnish the Foundation's Transcendental Meditation trademark.

COUNT I
CLAIM AGAINST THOMAS KNOLES —
BREACH OF FIDUCIARY DUTY

82. The Foundation incorporates by reference paragraphs 1-81 of this Complaint as if set forth in full here.
83. This Court has supplemental jurisdiction over this claim pursuant to 28 U.S.C. § 1367(a).
84. On or about December 22, 1972, a fiduciary relationship was established and subsisted between Maharishi Mahesh Yogi (including the organizations he founded or encouraged the founding of for the purpose of teaching or promoting the teaching of the Transcendental Meditation technique), and Defendant Thomas Knoles.
85. The Foundation, is an organization founded through the Maharishi Mahesh Yogi's overall organizational efforts.
86. Defendant Knoles breached that fiduciary relationship. Knoles disclosed confidential information imparted in trust and confidence to him to others (including the other Defendants) and by working personally to profit from that trust and confidence at the expense of the Foundation and other organizations founded or encouraged by Maharishi Mahesh Yogi.
87. Defendant Thomas Knoles acted with willful and wanton disregard for the rights of the Foundation.
88. On the basis of the foregoing acts, the Foundation has been and continues to be damaged.

COUNT II
CLAIM AGAINST THOMAS KNOLES —
BREACH OF CONTRACT

89. The Foundation incorporates by reference paragraphs 1-81 of this Complaint as if set forth in full here.
90. This Court has supplemental jurisdiction over this claim pursuant to 28 U.S.C. § 1367(a).
91. Defendant Thomas Knoles entered into a contract with Maharishi Mahesh Yogi and the organizations he founded or encouraged the founding of for the purpose of teaching or promoting the teaching of the Transcendental Meditation technique. One of those organizations is the Foundation..
92. Alternatively, The Foundation, as the U.S. organization responsible for teaching the Transcendental Meditation technique (and with exclusive rights to enforce the TM mark), was and is an intended beneficiary of the contract between Maharishi Mahesh Yogi and the organizations he founded and Defendant Thomas Knoles.
93. Defendant Knoles breached that contract by disclosing to others (including the other Defendants) confidential information imparted to him in trust and confidence.
94. Defendant Thomas Knoles further breached that contract by using the knowledge he gained in trust and confidence to teach meditation outside the

organizations Maharishi Mahesh Yogi founded or encouraged others to found and at the expense of such organizations, including the Foundation.

95. On the basis of the foregoing acts, the Foundation has been and continues to be damaged as a result of Defendant Thomas Knoles' breach of the contract.

**COUNT III
CLAIMS AGAINST ALL DEFENDANTS —
FALSE ADVERTISING
15 U.S.C. § 1125(a)**

96. The Foundation incorporates by reference paragraphs 1-81 of this Complaint as if set forth in full here.
97. This claim arises under the Lanham Act, 15 U.S.C. § 1051 et seq.
98. This Court has jurisdiction over this claim pursuant to 28 U.S.C. § 1331.
99. On the basis of the foregoing paragraphs, Defendants The Veda Center, Thomas Knoles, and The Meditation House in connection with services, used a false or misleading description of fact, or a false or misleading representation of fact, which in commercial advertising or promotion, misrepresents the nature, characteristics and qualities of Defendants' services.
100. The aforesaid acts of the Defendants will greatly and irreparably damage the Foundation unless enjoined by this Court, as a result of which the Foundation is without an adequate remedy at law.

COUNT IV
CLAIM AGAINST THE VEDA CENTER AND THOMAS KNOLES —
SECONDARY LIABILITY FOR
FALSE ADVERTISING
15 U.S.C. § 1125(a)

101. The Foundation incorporates by reference paragraphs 1-81 of this Complaint as if set forth in full here.
102. This claim arises under the Lanham Act, 15 U.S.C. § 1051 et seq.
103. This Court has jurisdiction over this claim pursuant to 28 U.S.C. § 1331.
104. With full knowledge that the Vedic Meditation technique is not the same as the Transcendental Meditation technique, the Defendants The Veda Center and Thomas Knoles have knowingly facilitated and materially contribute to misrepresentations made by third parties in violation of the Lanham Act, including but not limited to by encouraging and facilitating third parties, including Defendant The Meditation House, to misrepresent the efficacy and the amount of scientific research into the Vedic Meditation technique.

COUNT V
CLAIM AGAINST ALL DEFENDANTS —
UNFAIR COMPETITION
15 U.S.C. § 1114(1)

105. The Foundation incorporates by reference paragraphs 1-81 of this Complaint as if set forth in full here.
106. This claim arises under the Lanham Act, 15 U.S.C. § 1051 et seq.
107. This Court has jurisdiction over this claim pursuant to 28 U.S.C. § 1331.

108. On the basis of the foregoing paragraphs, the Defendants have represented falsely that their services and businesses are legitimately connected with the Foundation and its services, have described falsely that the Defendants' services and business are sponsored or approved by the Foundation, and have designated falsely that the Defendants' services originate from the Foundation.
109. The aforesaid acts of the Defendants will greatly and irreparably damage the Foundation unless enjoined by this Court, as a result of which the Foundation is without an adequate remedy at law.

COUNT VI
CLAIM AGAINST ALL DEFENDANTS —
TRADEMARK INFRINGEMENT
15 U.S.C. § 1114(1)

110. The Foundation incorporates by reference paragraphs 1-81 of this Complaint as set forth in full here.
111. This claim arises under the Lanham Act, 15 U.S.C. § 1051 et seq.
112. This Court has jurisdiction over this claim pursuant to 28 U.S.C. § 1331.
113. On the basis of the foregoing paragraphs, the Defendants, in connection with their services, have infringed the Foundation's U.S. Trademark Reg. No. 1,082,923 for Transcendental Meditation in interstate commerce. Specifically, the Defendants' intentional and deliberate statements that their services are equivalent to, the same as, or may be correctly referred to as Transcendental Meditation are likely to cause confusion, or to cause mistake, or to deceive

consumers as to the source and quality of their services, or alternatively, destroy the origin-identifying function of the Transcendental Meditation trademark.

114. The aforesaid acts of the Defendants will greatly and irreparably damage the Foundation unless enjoined by this Court, as a result of which the Foundation is without an adequate remedy at law.

COUNT VII
CLAIM AGAINST THE VEDA CENTER AND THOMAS KNOLES —
CONTRIBUTORY TRADEMARK INFRINGEMENT
15 U.S.C. § 1114(1)

115. The Foundation incorporates by reference paragraphs 1-81 of this Complaint as if set forth in full here.
116. This claim arises under the Lanham Act, 15 U.S.C. § 1051 et seq.
117. This Court has jurisdiction over this claim pursuant to 28 U.S.C. § 1331.
118. With full knowledge of the Foundation's rights, the Defendants have knowingly facilitated and materially contributed to third party infringements of the Transcendental Meditation trademark in violation of the Lanham Act, including but not limited to by encouraging and facilitating the other Defendants (including the Meditation House) to use the Transcendental Meditation trademark in describing services offered under the Vedic Meditation trademark.
119. The aforesaid acts of the Defendants will greatly and irreparably damage the Foundation unless enjoined by this Court, as a result of which the Foundation is without an adequate remedy at law.

COUNT VIII
CLAIM AGAINST ALL DEFENDANTS —
FEDERAL UNFAIR COMPETITION, FALSE DESIGNATION OF ORIGIN,
PASSING OFF AND TRADEMARK AND TRADE DRESS INFRINGEMENT
15 U.S.C. § 1125(a)

120. The Foundation incorporates by reference paragraphs 1-81 of this Complaint as if set forth in full here.
121. This claim arises under the Lanham Act, 15 U.S.C. § 1051 et seq.
122. This Court has jurisdiction over this claim pursuant to 28 U.S.C. § 1331.
123. On the basis of the foregoing paragraphs, the Defendants, in connection with their services, have wrongfully used the Transcendental Meditation trademark, appropriated Maharishi Mahesh Yogi's name and likeness which is intimately associated with the Transcendental Meditation technique and the Foundation and appropriated the systems and methods used by the Foundation to teach the Transcendental Meditation technique.
124. Consequently, consumers are led to believe that the Veda Meditation technique originates with or is sponsored or otherwise approved by the Foundation or otherwise pass off the services offered under the Vedic Meditation trademark as those offered under the Transcendental Meditation trademark, in violation of the Lanham Act, or alternatively, will cause consumers to believe that the Transcendental Meditation trademark is generic, thus destroying the goodwill and value the Foundation has built with the Transcendental Meditation trademark.

125. The foregoing acts and conduct by the Defendants constitute false designation of origin, passing off, and false advertising in connection with their services.

COUNT IX
CLAIM AGAINST THE VEDA CENTER AND THOMAS KNOLES —
CONTRIBUTORY LIABILITY FOR
FEDERAL UNFAIR COMPETITION, FALSE DESIGNATION OF ORIGIN,
PASSING OFF, AND TRADEMARK AND TRADE DRESS INFRINGEMENT
15 U.S.C. § 1125(a)

126. The Foundation incorporates by reference paragraphs 1-81 of this Complaint as if set forth in full here.
127. This claim arises under the Lanham Act, 15 U.S.C. § 1051 et seq.
128. This Court has jurisdiction over this claim pursuant to 28 U.S.C. § 1331.
129. With full knowledge of the Foundation's rights, Defendants The Veda Center and Thomas Knoles have knowingly facilitated and materially contributed to third party infringements of the Transcendental Meditation trademark in violation of the Lanham Act, including but not limited to by encouraging and facilitating The Meditation House to use the Transcendental Meditation trademark in describing services offered under the Vedic Meditation trademark.
130. With full knowledge of the Foundation's rights, The Veda Center and Thomas Knoles have knowingly facilitated and materially contributed to third party infringements, including by encouraging and facilitating The Mediation House to believe that the Veda Mediation technique originates with or is sponsored or otherwise approved by the Foundation or otherwise pass of the services offered

under the Vedic Meditation trademark as those offered under the Transcendental Meditation trademark, in violation of the Lanham Act, or alternatively, cause others to believe that the Transcendental Meditation trademark is generic, thus destroying the goodwill and value the Foundation has built with the Transcendental Meditation trademark.

131. The aforesaid acts of The Veda Center and Thomas Knoles will greatly and irreparably damage the Foundation unless enjoined by this Court, as a result of which the Foundation is without an adequate remedy at law.

COUNT X
CLAIM AGAINST ALL THE DEFENDANTS —
TRADEMARK DILUTION
15 U.S.C. § 1125(c)

132. The Foundation incorporates by reference paragraphs 1-81 of this Complaint as if set forth in full here.
133. This claim arises under the Lanham Act, 15 U.S.C. § 1051 et seq.
134. This Court has jurisdiction over this claim pursuant to 28 U.S.C. § 1331.
135. On the basis of the foregoing paragraphs, Defendants willfully intended to trade on the Foundation's reputation and to cause dilution of the Foundation's famous Transcendental Meditation trademark.
136. The aforesaid acts of the Defendants will greatly and irreparably damage the Foundation unless enjoined by this Court, as a result of which the Foundation is without an adequate remedy at law.

COUNT XI
CLAIM AGAINST ALL DEFENDANTS —
FALSE REPRESENTATION
UNDER STATE LAW

137. The Foundation incorporates by reference paragraphs 1-81 of this Complaint as if set forth in full here.
138. This claim arises under the common law of the State of Iowa.
139. This Court has supplemental jurisdiction over this claim pursuant to 28 U.S.C. § 1367(a).
140. On the basis of the foregoing paragraphs, the Defendants, in connection with services, used a false or misleading description of a material fact, or a false or misleading representation of a material fact, which in commercial advertising or promotion, misrepresents the nature, characteristics and qualities of the Defendants' services.
141. The aforesaid acts of the Defendants have and will continue to greatly and irreparably damage the Foundation unless enjoined by this Court, as a result of which the Foundation is without an adequate remedy at law.

COUNT XII
CLAIM AGAINST ALL DEFENDANTS —
UNFAIR COMPETITION
UNDER STATE LAW

142. The Foundation incorporates by reference paragraphs 1-81 of this Complaint as if set forth in full here.
143. This claim arises under the common law of the State of Iowa.

144. This Court has supplemental jurisdiction over this claim pursuant to 28 U.S.C. § 1367(a).
145. On the basis of the foregoing paragraphs, the Defendants' willfully intended to trade on the Foundation's reputation and to cause dilution of the Foundation's famous Transcendental Meditation trademark.
146. The aforesaid acts of the Defendants have and will continue to greatly and irreparably damage the Foundation unless enjoined by this Court, as a result of which the Foundation is without an adequate remedy at law.

**COUNT XIII
CLAIM AGAINST ALL DEFENDANTS —
TRADEMARK INFRINGEMENT
UNDER STATE LAW**

147. The Foundation incorporates by reference paragraphs 1-81 of this Complaint as if set forth in full here.
148. This claim arises under Iowa Code § 548.112.
149. This Court has supplemental jurisdiction over this claim pursuant to 28 U.S.C. § 1367(a).
150. On the basis of the foregoing paragraphs, the Defendants' acts constitute trademark infringement.
151. The aforesaid acts of the Defendants have and will continue to greatly and irreparably damage the Foundation unless enjoined by this Court, as a result of which the Foundation is without an adequate remedy at law.

**COUNT XIV
CLAIM AGAINST ALL DEFENDANTS —
TRADEMARK DILUTION
UNDER STATE LAW**

152. The Foundation incorporates by reference paragraphs 1-81 of this Complaint as if set forth in full here.
153. This claim arises under Iowa Code § 548.113.
154. This Court has supplemental jurisdiction over this claim pursuant to 28 U.S.C. § 1367(a).
155. On the basis of the foregoing paragraphs, the Defendants' acts constitute a dilution of the Foundation's business reputation.
156. The aforesaid acts of the Defendants have and will continue to greatly and irreparably damage the Foundation unless enjoined by this Court, as a result of which the Foundation is without an adequate remedy at law.

**COUNT XV
CLAIM AGAINST ALL DEFENDANTS —
UNJUST ENRICHMENT
UNDER STATE LAW**

157. The Foundation incorporates by reference paragraphs 1-81 of this Complaint as set forth in full here.
158. This claim arises under Iowa Code § 548.113.
159. This Court has supplemental jurisdiction over this claim pursuant to 28 U.S.C. § 1367(a).

160. On the basis of the foregoing paragraphs, the Defendants' acts constitute unjust enrichment of the Defendants at the expense of the Foundation.

WHEREFORE, Plaintiff Maharishi Foundation USA, Inc. respectfully requests that this Court grant judgement against Defendants The Veda Center, Thomas Knoles, and the Meditation House, LLC on all claims by Entry of an Order of this Court, providing as follows:

a. Defendants, their servants, agents, officers, directors, and employees, and all other persons in active concert or participation with it, or any of its successors and assigns be preliminarily and permanently enjoined as follows:

1. From making false and misleading statements and representations concerning scientific studies conducted on practitioners of the Transcendental Meditation technique in the sale by the Defendants of their services, including statements and representations concerning health benefits from Defendants' services;

2. To disseminate appropriate and effective corrective advertising and promotional materials to the Defendants' customer base, including, but not limited to, on the websites belonging to the Defendants, including www.themeditationhouse.com, www.thomknoles.com, and www.thevedacenter.com, to correct the Defendants' false, misleading and deceptive representations;

3. To notify each and every customer who purchased services from the Defendants that the services provided by the Defendants have not been the subject of any scientific study, that there is no scientific evidence that the technique taught by the Defendants reduces the risk of heart disease or normalizes blood pressure, and that there is no published scientific study that demonstrates health benefit from the technique taught by the Defendants.

4. From using, in the advertisement, promotion, offering for sale, or sale of any services or the promotion of the Defendants' business, the Transcendental Meditation trademark or any other colorable imitation thereof;

5. From expressly or impliedly representing themselves to customers, potential customers, or the public to be affiliated in any way with the Foundation in connection with the sale, offering for sale, distribution, advertising, or promotion of services or the promotion of the Meditation House's business;

6. From expressly or impliedly representing themselves to customers, potential customers, or the public to be affiliated in any way with Maharishi Mahesh Yogi in connection with the sale, offering for sale, distribution, advertising, or promotion of services or the promotion of the Defendants' businesses; and

7. From representing by words or conduct that the Defendants' businesses or any product or service provided, offered for sale, sold, advertised, or rendered by the Defendants is authorized, sponsored, or endorsed by or otherwise connected with the Foundation.

b. Defendants be required to account for and pay over to the Foundation all damages suffered by the Foundation and all profits wrongfully derived by the Defendants as a result of their false advertising, trademark infringement, trademark dilution, unfair trade practices, and unfair competition.

c. Defendants be required to pay over to the Foundation three times the actual damages sustained by the Foundation, together with the reasonable attorneys' fees and costs incurred by the Foundation in the prosecution of this action.

d. Defendant Thomas Knoles be required to pay punitive damages to the Foundation.

e. Defendants be ordered to deliver up for destruction all labels, signs, prints, insignia, brochures, and any other written or recorded material or advertisements in their possession or control containing the Transcendental Meditation trademark or any colorable imitation thereof.

f. Defendants be ordered to deliver up for destruction all labels, signs, prints, insignia, brochures, and any other written or recorded material or advertisements in its possession or control based on the systems and methods used by the Foundation in connection with the Transcendental Meditation trademark or any colorable imitation thereof.

g. Defendants be ordered to deliver up for destruction all labels, signs, prints, insignia, brochures, and any other written or recorded material or advertisements in their possession or control using Maharishi Mahesh Yogi's name or likeness, or any colorable imitation thereof.

h. Defendants be required, in accordance with 15 U.S.C. § 1116, to file with this Court and serve on the Foundation within thirty (30) days from the date of entry of any injunction a report in writing, under oath, setting forth in detail the manner and form in which the Defendants have complied with the terms of the injunction.

i. The Foundation have such other and further relief in law and in equity as the Court deems just and equitable.

/s/ Mark L. Zaiger

MARK L. ZAIGER

AT0008655

JASON R. SYTSMA

AT0009728

for

SHUTTLEWORTH & INGERSOLL, P.L.C.

115 3rd Street SE, Suite 500, P.O. Box 2107

Cedar Rapids, IA 52406

PHONE: (319) 365-9461

FAX: (319) 365-8443

mlz@shuttleworthlaw.com

jrs@shuttleworthlaw.com

ATTORNEYS FOR PLAINTIFF MAHARISHI
FOUNDATION USA, INC.

Copy to:

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Timothy N. Lillwitz
Bradshaw, Fowler, Proctor & Fairgrave, P.C.
801 Grand Avenue, Suite 3700
Des Moines, IA 50309-5808

Eric M. Braun, Esq.
Level 34, 50 Bridge Street
Sydney, NSW, Australia

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of this document was served upon counsel of record for each party to the action in compliance with FRCP 5 on February 7, 2013 by:

☒ Electronically via ECF for ECF registrants
☐ U.S. Mail _____
☐ Fax _____
☐ Fed Ex _____
☐ Hand Delivered _____
☐ other _____

/s/ Heather Bertch

Int. Cl.: 41

Prior U.S. Cl.: 107

Reg. No. 1,082,923

United States Patent and Trademark Office

Registered Jan. 17, 1978

10 Year Renewal

Renewal Term Begins Jan. 17, 1998

**SERVICE MARK
PRINCIPAL REGISTER**

TRANSCENDENTAL MEDITATION

MAHARISHI FOUNDATION, LTD.
(UNITED KINGDOM CORPORATION)
P.O. BOX 652

ST. HELIER JERSEY JE4 8YZ, CHANNEL ISLANDS, ASSIGNEE OF
WORLD PLAN EXECUTIVE COUNCIL-UNITED STATES (CALIFORNIA
NON-PROFIT CORPORATION), PACIFIC PALISADES, CA

SEC. 2(F).

FOR: EDUCATIONAL SERVICES—
NAMELY, CONDUCTING COURSES
AND SEMINARS ON PERSONAL DEVELOPMENT, IN CLASS 41 (U.S. CL. 107).

FIRST USE 0-0-1965; IN COMMERCE
0-0-1966.

SER. NO. 73-096,512, FILED 8-12-1976.

*In testimony whereof I have hereunto set my hand
and caused the seal of The Patent and Trademark
Office to be affixed on May 26, 1998.*

Oct. 6 '70

Date of Interview

P. Hanson

Interviewer

10/9/70

Date of Initiation

Initiator's Signature

JAI GURU DEV
STUDENTS' INTERNATIONAL MEDITATION SOCIETY
COURSE I

Please fill out this form for enrollment and as a step toward initiation into Transcendental Meditation as taught by Maharishi Mahesh Yogi. This information will be kept confidential.

Name Thom Knoles (Please print) Age 21 Marital Status Single
Address 6429 Woodville City Falls Church State VA. Zip 22041 Phone 532-7339

Permanent Address (if different from above) SAME

University, college or high school _____ Year _____ Major _____

If not attending now, state last school attended Jeb Stuart Year '67 Major _____

Do you plan to continue your studies? Possibly

If employed part or full time, state occupation Surfboard Salesman

Are you under 21 and living with your parents? Yes _____ No X

(If yes, please furnish a signed letter from your parents stating that they are aware that you are beginning the practice of Transcendental Meditation and they approve.)

Have you ever used any form of meditation, other spiritual practice, or program for self-improvement? Yes X No _____

If yes, Name of teacher, organization and/or book(s) For how long? Describe experiences and results

1. Self-Realization Fellowship 2 yrs. Insufficient space
2. Aatha Yoga 3 yrs. "
3. Autobiography of a Yogi - Yogananda Paramahansa "

What is your present state of mind? Good X Worried _____ Tense _____ Describe Searching for Self-Improvement

Do you sleep well? Yes X No _____

What is your present state of health? Excellent Have you ever had any prolonged physical condition such as heart or respiratory trouble, etc.? No Describe _____

Have you ever been (or are you now) under the care of a psychiatrist or on any other psychotherapeutic program? Yes _____ No X

If yes, when? _____

What type of program? _____

Have you ever taken hallucinogenic drugs? Yes Other drugs? Yes

The above information is furnished voluntarily by me in requesting instruction and interview preceding initiation with an initiator trained by Maharishi Mahesh Yogi. I wish to begin Transcendental Meditation to further my personal development. I realize the importance of verification and intellectual understanding of experiences in Transcendental Meditation and its effects in daily life; I will be able to attend the necessary sessions during the first four consecutive days of personal instruction.

October 6, 1970

Date

Thom Knoles

(Signature)

Exhibit B

JAI GURU DEV
STUDENTS' INTERNATIONAL MEDITATION SOCIETY
COURSE I

Name Thom Knoles
Age 21

FIRST DAY
Date of Initiation _____
Initiator _____

Please write in this space.

For about how many minutes did you meditate?

I think about 15 minutes total.

How do you feel now in body and mind?

Tranquil; yet I have a strange yearning for something.

Was it easy?

yes.

Was it peaceful?

yes.

Was there any moment of pleasantness?

yes.

Did you at any moment feel sleepy during meditation?

Not sleepy but relaxed.

Do you feel sleepy now, after meditation?

I feel as though I have just awoken from a nap.

Did the mantra change in any way — did you feel that at times it became slower or faster, fainter, etc.?

I was sort of letting my mantra do it's own thing. It kept a fairly steady beat, though.

Did you sometimes lose the mantra?

yes.

Did many thoughts come?

yes.

Did thoughts disturb you?

I tried to let everything take its course.

Did you hear outer noises?

A few.

Did you feel disturbed by outer noise?

No.

Other remarks regarding your meditation.

It is hard for me to do this meditation in a chair without a higher back because my head keeps dropping

Tomorrow
come to have
your meditation
checked at:
Time:
Place:

JAI GURU DEV
STUDENTS' INTERNATIONAL MEDITATION SOCIETY
COURSE I

FIRST DAY FOLLOWING INITIATION

NAME Thom Knoles

DATE _____

AGE _____

INITIATOR _____

INITIATOR'S SIGNATURE _____

Please write in this space.

How many times have you meditated since your last checking?

Twice

How long did you meditate each time?

15 minutes

Did you feel that time during meditation passed quickly?

It felt as a usual passing.

Did you at any moment find that you were unaware of body and surroundings?

I was only aware of the omnipresence of the mantra.

Did you at moments feel some happiness within?

The second time, yes.

Did thoughts disturb you?

The first time.

During meditation did you notice any change in your breathing?

yes

During meditation did you feel so relaxed as to feel sleepy?

no

How did you feel today as compared with other days?

different

Are you satisfied with your meditation so far?

yes

Any other remarks?

USE OTHER SIDE IF NECESSARY

Come tomorrow for verification of experiences and further instructions at: Time _____ Place _____

JAI GURU DEV
STUDENTS' INTERNATIONAL MEDITATION SOCIETY
COURSE I

SECOND DAY FOLLOWING INITIATION

NAME Thom Knoks

DATE 10-11-70

AGE _____

INITIATOR _____

INITIATOR'S SIGNATURE R. Hanson

	Please write in this space.
How many times have you meditated since your last checking?	Once
How long did you meditate each time?	15-20 min.
Did you at any moment find that you were unaware of body and surroundings?	Yes
Did thoughts disturb you?	No
During meditation did you notice any change in your breathing?	Yes
Approximately how many times do you lose the mantra during each meditation?	Twice
Do you remember any moments when there was no mantra and no thoughts?	Yes.
After meditation do you feel inclined to rest, or do you feel energetic?	Aware.
Have you noticed any indication of increasing clarity of mind?	Yes.
Have you noticed any improvement in your relationship with others?	Yes.
Has anyone remarked upon any change in you?	No.
How do you feel today as compared to yesterday?	Mellow. Tranquil.
Do you now feel that you have understood how to meditate?	Yes.
Any other remarks?	I got rid of a pain in my abdomen this morning through meditation.

USE OTHER SIDE IF NECESSARY

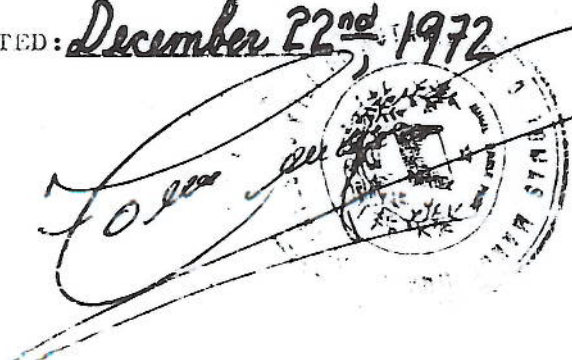
Come tomorrow for verification of experiences and further instructions at: Time _____ Place _____

TO HIS HOLINESS MAHARISHI MAHESH YOGI

It is my privilege, Maharishi, to promise to teach the Principles and Practice of Transcendental Meditation only as a teacher--employee of SIMS which accepts me as such; that I will always hold the teaching in trust for you, dear Maharishi, and SIMS; that I will never use the teaching except as a teacher in SIMS or other organizations founded by you for the purpose of carrying on your work of spreading Transcendental Meditation for the good of Mankind; that as a teacher in SIMS I shall receive such compensation as shall be agreed between myself and SIMS in writing and, except as agreed in writing I expect to receive no monetary compensation but am fully compensated by the love and joy that I receive from the work, by the alleviation of suffering that I may accomplish, and by the Wisdom that I obtain, expound, and cherish. In furtherance of this pledge I acknowledge that prior to receiving the training I had no prior knowledge of such system of Teaching; that there is no other available source where the knowledge of such teaching may be obtained; that such teaching has been imparted to me in trust and confidence; that such training is secret and unique. I further recognize that as a Meditation Guide and Initiator I am a link in the chain of organizations that you have founded; and that to retain the purity of the teaching and movement, you have laid down the wise rule that, should I ever cease to teach in SIMS or other organizations founded by you for the purpose of teaching Transcendental Meditation, I may be restrained by appropriate process from using this secret Teaching of Transcendental Meditation imparted to me.

It is my fortune, Guru Dev, that I have been accepted to serve the Holy Tradition and spread the Light of God to all those who need it. It is my joy to undertake the responsibility of representing the Holy Tradition in all its purity as it has been given to me by Maharishi and I promise on your altar, Guru Dev, that with all my heart and mind I will always work within the framework of the Organizations founded by Maharishi. And to you, Maharishi, I promise that as a Meditation Guide I will be faithful in all ways to the trust that you have placed in me. Jai Guru Dev.

DATED: December 22nd, 1972



MAHARISHI MAHESH YOGI
Thomas Merritt Knoles IV
THOMAS MERRITT KNOLES IV
INITIATOR
AUSTRALIA (PERMANENT RESIDENT)

Exhibit C

SHUTTLEWORTH & INGERSOLL, P.L.C.
ATTORNEYS AT LAW ESTABLISHED 1854

V.C. SHUTTLEWORTH 1900-1965
T.M. INGERSOLL 1902-1972

MICHAEL O. McDERMOTT
JOHN M. BICKEL
ROBERT D. HOUGHTON
RICHARD S. FRY
RICHARD C. GARBERSON
GARY J. STREIT
CARROLL J. REASONER
STEVEN J. PACE
GLENN L. JOHNSON
ROBERT W. HOKE
THOMAS P. PEPPER

DENNIS J. McMENIMEN
KEVIN H. COLLINS
WILLIAM P. PROWELL
DIANE KUTZKO
MARK L. ZAIGER
DOUGLAS R. OELSCHLAGER
WESLEY B. HUISINGA
DEAN R. EINCK
LINDA M. KIRSCH
CONSTANCE M. ALT
WILLIAM S. HOCHSTETLER
BRIAN D. BERGSTROM
GILDA L. BOYER

NANCY J. PENNER
KEVIN J. CASTER
THERESA C. DAVIS
SARAH J. GAYER
LAURIE L. DAWLEY
JENNIFER E. RINDEN
PATRICIA HOFFMAN-SIMANEK
MARTY L. ROWLET
JACE T. BISGARD
RYAN N. CARTER
HEATHER L. FLEMING
CARRIE L. LA SEUR

REGISTERED PATENT LAWYERS
JAMES C. NEMMERS
GLENN L. JOHNSON
ROBERT W. HOKE
RYAN N. CARTER
COUNSEL
JENNA M. WISCHMEYER
OF COUNSEL
THOMAS M. COLLINS
WILLIAM R. SHUTTLEWORTH
JAMES C. NEMMERS

December 19, 2005

VIA EMAIL & REGULAR MAIL

Mr. Thom Knoles
c/o William Dalton
1338 N. Laurel Ave., #104
West Hollywood, CA 90046

Dear Mr. Knoles:

We represent Maharishi Foundation, Ltd, the owner of the federally registered mark "Transcendental Meditation", and its sublicensees in the United States, including the David Lynch Foundation for Consciousness-Based Education and World Peace.

You are making the statements quoted below from your website www.thomknoles.com which statements are misleading and contain representations that constitute infringements on our client's rights to its "Transcendental Meditation" mark. Such statements include the following:

1) Exploring the Veda

.... **Prerequisite:** In order to participate in *Exploring the Veda* you must have been instructed in transcendental meditation as taught by Thom Knoles.

You are using the mark "Transcendental Meditation" improperly as a generic term, which it is not. Moreover, you are not licensed to use the mark "Transcendental Meditation" or to teach that program. You must cease all uses of that mark in your materials and activities.

2) The David Lynch Foundation for Consciousness-Based Education & World Peace

This Foundation was established to ensure that any child in America who wants to learn and practice the meditation can do so.

The David Lynch Foundation for Consciousness-Based Education does not support "the meditation" or your activities and you should cease making any reference to the Foundation.

Mr. Thom Knoles
December 19, 2005
Page 2

Your statements make inappropriate connections between your programs and the Foundation which do not exist.

3) What does scientific research say about Vedic meditation?

Over 500 scientific research studies conducted during the past 25 years at more than 200 independent universities and research institutes in 30 countries have shown that this meditation benefits every areas of an individual's life: mind, body, behavior, and environment.

The studies you reference were conducted on the "Transcendental Meditation" programs and not on the programs you teach. Your claims constitute deceptive misrepresentations. We are not aware of any scientific studies conducted on your programs. In any event, using studies derived from the "Transcendental Meditation" programs to promote your programs is unlawful.

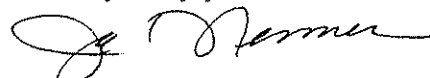
4) Science of Being and Art of Living: Transcendental Meditation
By Maharishi Mahesh Yogi

Maharishi Mahesh Yogi on the Bhagavad-Gita : A New Translation and Commentary
By Maharishi Mahesh Yogi

Links to publications authored by Maharishi create the impression of a connection of your programs to those founded by Maharishi including the "Transcendental Meditation" program. No such connections exist and you are not qualified or licensed to teach such programs. Therefore, the links are misleading and should be removed.

We thank you for your anticipated co-operation in changing the about references as we have requested so that legal action will not be required. Please contact the undersigned and confirm that you will comply with our demands.

Very truly yours,



JAMES C. NEMMERS
jcn@shuttleworthlaw.com

JCN:dlr

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION

MAHARISHI FOUNDATION USA,
INC.,

Plaintiff,

Case No. 4:11-cv-00562

v.

THE MEDITATION HOUSE, LLC,

AFFIDAVIT OF THOM KNOLES

Defendant.

1. Thom Knoles, do hereby state under penalty of perjury:

1. In 1972, I attended a 12 week training course in Spain. It related to a type of meditation that originated thousands of years ago in India, is described in Vedic literature from that period, and that, from about 1960, had widely taught and promoted around the world by the Maharishi Mahesh Yogi. In this course, I was trained personally by a person who referred to himself as, and became widely known as, Maharishi Mahesh Yogi to teach students how to practice the above type of meditation. In 1975 I received additional personal instruction from Maharishi Mahesh Yogi in how to train other persons to teach students to practice this type of meditation.

2. In the period of over 35 years since receiving this instruction, and continuing today, I have devoted myself to, and have earned my livelihood primarily from teaching this type of meditation, and how to teach it. During the period from 1972 to the present, I estimate that I have taught over 20,000 persons to practice this type of meditation, and over 40 persons how teach how to teach others to practice this type of meditation.

3. During the period from 1972 until 1997, I did this in association with and with the support and approval of organizations, such as the Maharishi Vedic University and World Plan Executive Council Australia (WPECA), founded with the encouragement of Maharishi Mahesh Yogi. In 1997, my affiliation with such organizations ended. Since that time I have continued to teach this type of meditation independently, using the same methods and approach I learned from the Maharishi Mahesh Yogi. During the period from 1972 until about 2005, I generally

used the words “transcendental meditation” to refer to this type of meditation. From about 2005, I began to use the terms Vedic Meditation to refer to my teaching of this type of meditation.

4. As a result of my work since about 2005, a substantial network of persons teaching this type of meditation, and using the terms “Vedic Meditation” to do so, now exists. There are over 40 such teachers, who have all either been taught by me or by persons I have taught. To the best of my knowledge, all persons offering to teach Vedic Meditation do so based on instruction sourced from me, which I in turn received originally from Maharishi Mahesh Yogi.

5. There have been and continue to be a large number of organizations, which I refer to here collectively as “the TM Movement,” who also offer the services of teaching this type of meditation and how to teach it. At various points in time, such organizations have used various terms to refer to their offering of this type of meditation, including “Deep Meditation,” “Transcendental Deep Meditation,” “practical aspect of the Science of Creative Intelligence,” “the Maharishi Technology of the Unified Field, and “Transcendental Meditation. Currently the terms “Transcendental Meditation” are most widely used by them.

6. The TM Movement places great emphasis, in promoting their services, on this type of meditation being the same type of meditation practiced thousands of years ago in India, as referred to in the ancient Vedic literature, being the same type of meditation taught and popularized by Maharishi Mahesh Yogi, and being the only type of meditation that has been the subject of hundreds of scientific studies supporting its health and other benefits. This is illustrated by the following excerpts from the main website used by the TM Movement currently:

How many people practice the TM technique?

More than five million people worldwide have learned this simple, natural technique — people of all ages, cultures, and religions.

How much scientific research has been done on the TM technique?

Over 600 research studies have been conducted at more than 200 universities and research centers (including Harvard, UCLA, and Stanford). These studies have been published in more than 100 journals.

Where did the TM technique come from?

The Transcendental Meditation technique is based on the

ancient Vedic tradition of enlightenment in India. This knowledge has been handed down by Vedic masters from generation to generation for thousands of years. About 50 years ago, Maharishi — the representative in our age of the Vedic tradition — introduced Transcendental Meditation to the world, restoring the knowledge and experience of higher states of consciousness at this critical time for humanity. When we teach the Transcendental Meditation technique today, we maintain the same procedures used by teachers thousands of years ago for maximum effectiveness.

7. Lawyers for the Plaintiff have sent numerous demand letters to me, and to other person who persons who teach Vedic Meditation and who were taught how to do so by me. The common element in the claims against me, the many teachers of Vedic Meditation trained by me, and against the Meditation House LLC, is that Vedic Meditation is not that the same type of meditation as is taught by the TM Movement. In other words, the TM Movement claims that Vedic Meditation is not the same type of meditation as taught and popularized by the Maharishi Mahesh Yogi, that originated in ancient India and is referred to ancient Vedic literature, that has been the subject of hundreds of scientific studies supporting its health and other benefits, and that is practiced by millions of people around the world. Instead, it is claimed, in effect, that I and other persons using the terms Vedic Meditation are teaching a type of meditation that has little or no historical or scientific foundation.

8. As referred to above, this attack or claim against Vedic Meditation is incorrect.

9. As the person who has popularized and promoted the terms Vedic Meditation, and been responsible for training teachers of Vedic Meditation, and who has invested over 40 years of my life in teaching this type of meditation, I have a very significant interest in being able to contest, and disprove, this claim, and related claims, against Vedic Meditation, me, and persons I have taught Vedic Meditation or how to teach it.

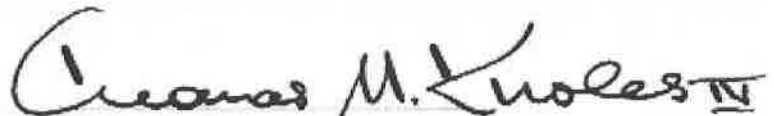
10. For example, if this case were to go forward without my participation, and Plaintiff were able to obtain a ruling that Vedic Meditation is a different type of meditation than what the Plaintiff and its affiliates brand as "Transcendental Meditation", that would have a significant and adverse commercial and reputational effect on me and the other teachers of Vedic Meditation. For example, Plaintiff's lawyers can then publish widely that Vedic Meditation is not the same type of meditation referred to above, and in effect has little or no historical or

scientific foundation, and can seek to use this Court's decision to attack my personal and professional reputation and livelihood, and to discourage persons from learning Vedic Meditation, or how to teach it, from me and other teachers of Vedic Meditation.

11. I also believe that I am the only person who is in a position to provide definitive evidence showing whether Vedic Meditation is the same type of meditation as taught by the Maharishi Mahesh Yogi, and referred to by the TM Movement him as Transcendental Meditation. That is because, to the best of my knowledge, I am the only person who has been instructed personally by the Maharishi Mahesh Yogi how to teach this type of meditation, and teach others how to teach it and who also knows the methods I have used, after 2005, to continue to teach meditation, and how to teach it, using the terms Vedic Meditation.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on January 5, 2013.


Thom Knoles

Jim Nemmers

From: Thomas Knoles [thomknoles@tmknoles.com]
Sent: Wednesday, December 28, 2005 10:17 AM
To: Jim Nemmers
Cc: Aleco Vrisakis
Subject: Maharishi Foundation, Limited

28 December 2005

Dear Mr. Nemmers,

Your letter of December 19, 2005 did not come as a surprise to me.
I have recently become aware of your client's expansive claims and assertions following its eventual registration of "Transcendental Meditation" as a trade mark in Australia.

I have always sought, and acted on, qualified and competent legal advice in the context of confrontation by your client. I am advised that the claims and assertions in your letter to me, like their precursors, are without legal foundation. I do not intend to traverse them specifically, as your letter has served to emphasize the desirability, in the interests I represent, of expressly and completely dissociating my teachings from your client's programs and methods.

I will amend my website accordingly.

Yours sincerely,

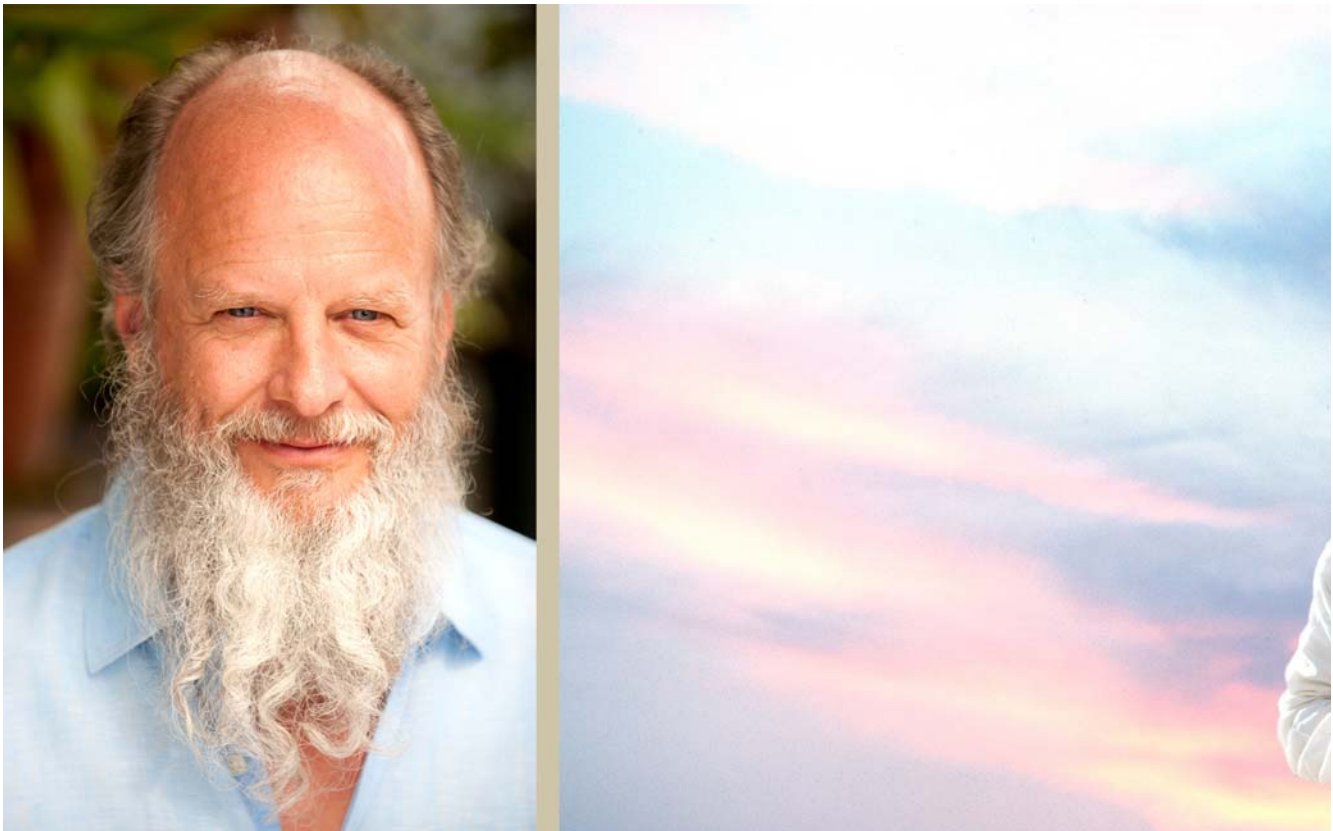
T. M. Knoles

Thom Knoles

- [FACEBOOK](#)
- [TWITTER](#)
- [VIDEO](#)
- [Audio](#)
- [Blog](#)
- [Contact](#)
 - [Join Mailing list](#)
- [About Thom](#)
- [Learn to Meditate](#)
- [Advanced Classes»](#)
- [Retreats](#)
- [Calendar](#)

About Thom



Photographs by Christopher Medak ©

Exhibit G

Thom Knoles is a maharishi (or pre-eminent master-teacher) of Vedic Meditation (an effortless mental technique that allows one to experience fully-awake restful consciousness and its many physiological benefits). He has tens of thousands of personally-taught students worldwide.

Thom is a thought-leader and celebrated speaker on the cognitive sciences, on the potential of the brain and health of the body, on the relationship between quantum physics and human consciousness, and on the 5,000 year-old body of wisdom known as the Veda (knowledge governing the unity of the laws of nature and human consciousness from which yoga, meditation, and Ayur Veda are derived).

In India, he is called “Maharishi Vyasanaanda.” It means “the great seer who sequentially elaborates knowledge blissfully”.

Born in the 1950s to American parents in post-war Germany, Thom grew up traveling extensively and was educated in Southeast Asia, Hawaii, California, and Washington, DC. His father was a highly-decorated US Air Force general and his paternal grandfather was a senator in Arizona.

In the '60s, Thom discovered yoga and his life was changed. He learned Vedic Meditation from Maharishi Mahesh Yogi, who became Thom's personal mentor and his predominant spiritual and educational influence over the next two decades. After basing himself in Australia, Thom became an acclaimed teacher of yoga and meditation before the age of twenty.

Continuing his training with Maharishi Mahesh Yogi in India and in Europe, Thom spent most of the 1970s teaching in Australia and researching abroad at Maharishi European Research University (MERU), a prestigious post-graduate neuroscience-and-consciousness research institute based in Switzerland which attracted the support of several Nobel laureates, eminent scholars and researchers.

He received an honorary doctorate, “Doctor of Science of Creative Intelligence” (D.Sci) in 1978 and quickly became a sought-after public speaker and educator, consulting to more than 40 top corporations and federal and state governments in Australia and abroad, as well as government-funded meditation programs in prisons in Australia and in the United States.

Thom became the national coordinator of a meditation-teaching organization in Australia, coordinating public relations, teaching activities, and advanced training of some 85 Australian meditation instructors. He oversaw the organization's expansion of physical facilities and real estate holdings into the 1980s. He had taught 3,000 new meditators before the age of thirty.



Photographs by Christopher Medak ©

After graduating from advanced training in the Vedic sciences with Maharishi Mahesh Yogi in India, Thom co-founded and co-managed a meditation-inspired private high school in Sydney. He worked in the Himalayas for King Birendra of Nepal siting and developing a foreign-aid funded Vedic university to preserve the Nepalese Vedic knowledge and culture.

He had a key role in a major meditation-for-peace teaching project in the Philippines during the People Power revolution. It culminated in 60,000 new meditators in Manila — ushering in a peaceful transition of power through group meditation practice.

The rest of the 1980s saw Thom carrying out extensive consulting work with Australian corporations and federal and state government bodies. He trained alongside Deepak Chopra in India under pre-eminent Ayur Vedic masters to become an Ayur Veda practitioner and educator. Lecturing widely and sharing the stage with Chopra and other eminent medical practitioners, he presented Ayur Veda to principal medical chiefs of major hospitals and the full board of the National Health and Medical Research Council (“NHMRC”) of Australia.

He began conducting several large-scale meditation retreats with upwards of 800 participants and was the subject of a major article in The Australian Financial Review reporting on the popularity of meditation programs in governments and corporations.

In the 1990s, Thom travelled the world lecturing, teaching and consulting. He taught meditation at the highest level in the United States and Australia to captains of industry and to government bodies, as well as privately mentoring hundreds of highly influential decision makers and celebrities. His total number of personally taught students surpassed 10,000 by the mid-90s.

After moving his family from Australia to reside in Arizona, Thom chaired the board of the Museum of Northern Arizona, the state’s premier institution of native American culture, anthropology, archaeology, and geology, guiding the museum through a critical and turbulent phase of its growth and funding requirements.

In the last decade, Thom began teaching widely in the United States, bringing Los Angeles, San Francisco, and New York City (starting a few days after September 11th, 2001) into a continuous rotating international teaching tour that reaches Australian major cities annually. His 108-day residential teacher-training programs in India continue to provide new teachers of Vedic Meditation internationally and his bi-annual 10-day meditation and knowledge retreats in the Indian Himalaya, have been attended by hundreds of participants from six countries studying advanced elements of Vedic wisdom.

Today, Thom continues to teach Vedic Meditation worldwide. In addition to a public client-base of tens of thousands of personally-taught students, he’s taught meditation to, and consulted to, the heads of many major Hollywood studios, several award-winning film industry leaders, two heads of state, and one Nobel Peace prize laureate.

Currently working with a stellar team of visionaries and organizers, Thom looks forward to spreading the joy of meditation to all who have the curiosity and desire to learn...

A short video about Vedic Meditation. For more video content, please [CLICK HERE](#).



Music courtesy of Rolfe Kent / [The Zen Effect](#) and Tanam Raga Aberi, photographed by David Rodriguez,

produced by Bradley Raider, directed by Jonni Pollard.

Thom Knoles is an independent meditation teacher. He is not affiliated in any way with the Maharishi Foundation, or with any organization that is affiliated with, or a licensee of, the Maharishi Foundation.

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Service Times & Directions

Weekend Masses in English

Saturday Morning: 8:00 am

Saturday Vigil: 4:30 pm

**Sunday: 7:30 am, 9:00 am, 10:45 am,
12:30 pm, 5:30 pm**

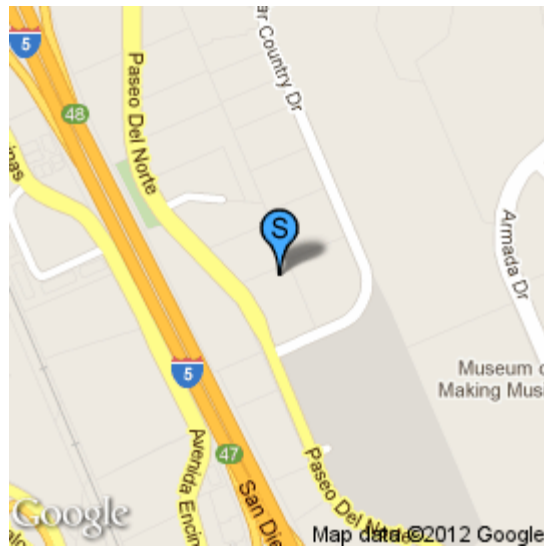
Weekend Masses In Español

Saturday Vigil: 6:15pm

Sunday: 9:00am, 7:15pm

Weekday Morning Masses

Monday, Tuesday, Thursday & Friday: 8:30 am



6654 Main Street
Wonderland, AK 45202
(513) 555-7856

Thom Knoles



VEDIC MEDITATION

Vedic Meditation is simple and easy to learn. It is a natural, effortless technique that anyone can practice. All that is required is to sit comfortably with the eyes closed for 20 minutes in the morning and evening.

Vedic Meditation allows the process of thinking to become increasingly quiet and settled. This continues until the mind transcends the faintest impulse of thought and experiences its most settled state while maintaining full alertness. As the mind settles, the body begins to rest very deeply.

Following meditation the mind is more alert, more calm and thinking is clearer. With regular meditation, people find their energy levels increase and they can achieve more with less effort. As a result, work, play and relationships are easier and more rewarding.

Benefits of Meditation:

According to scientific studies conducted at over 200 research institutes and universities, a few minutes of Vedic Meditation each day produces a wide range of practical physiological benefits—a clearer and more creative mind, better decision-making, improved health, greater happiness and more rewarding relationships. Meditators report feeling the effects of meditation immediately and changes occur quickly—improvements are often significant within the first few days of learning.

Scientific research on meditation shows many benefits, including:

- Reduced tension and anxiety
- Increased resistance to stress
- Improved memory and concentration
- Increased energy
- Improved physical health
- Reduced insomnia
- Increased self-esteem
- Slower aging

» [Learn to Meditate](#)

» [Meditation Resources](#)

» [Meditation F.A.Q.](#)

» [Finding Your Best Teacher](#)

Jules Green and The Meditation House, LLC expressly disclaim any association with Maharishi Foundation Ltd., its programs, its methods, its trademark "Transcendental Meditation" (the common words "transcendental" and "meditation" as defined in Webster's Dictionary but given an initial capital) and its licensees.

SEARCH

LATEST ENTRIES

- [Intro to Meditation](#)
- [Beyond The Affair: How conscious awareness about your relationship can help you heal.](#)
- [Unity: Reflections on Self Evolution as Collective Evolution](#)
- [What is REIKI Healing?](#)
- [Inspired Learning](#)
- [The Interplay of Masculine & Feminine Energies](#)
- [Living with Conscious Awareness](#)
- [The Power of Intention](#)
- [Our Nature is to Love](#)
- [Stay Curious.](#)

UPCOMING EVENTS

- July 9, 2011
[Workshop: WHY AM I HERE?!?](#) at 10:00 am
- July 10, 2011
[Group Meditation](#) at 11:00 am
- July 23, 2011
[Workshop: WHERE'D MY MOJO GO?](#) at 10:00 am
- August 5, 2011
[EXPLORING THE VEDA 1](#) at 12:00 am
- August 6, 2011
[EXPLORING THE VEDA 1](#) at 12:00 am
- August 7, 2011
[EXPLORING THE VEDA 1](#) at 12:00 am
[FREE TALK: Intro to Meditation](#) at 7:00 pm

LOCATIONS:

San Diego

619.446.6353

Des Moines

515.309.1873

New York

917.623.9286

GIVE:

Friends of Ramana's Garden

One Giving

Women for Women

HEAL:

All Things Healing

Mother of Health

Amazon Herb Co.

August 21, 2011

Group Meditation & Potluck at 11:00 am

Group Meditation at 11:00 am

FIND US:

 Facebook

 Twitter

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F.A.Q.

How do you practice the technique?

You sit comfortably in a chair with your back fully supported and your eyes closed for about 20 minutes twice a day – once in the morning and once in the evening. To an outside observer you will appear to be simply resting. During the meditation, your mind and body settle down into their least excited state. This phenomenon triggers a deep and profound state of restfulness.

So I don't have to join or worship a particular religion in order to meditate?

No. And you don't have to shave your head either – or wear funny clothes, change your name, sit in uncomfortable yoga positions, give away all of your possessions, be soft spoken or become a vegetarian. Whereas many meditation techniques are specifically designed by and for monks sitting in a cave, Vedic Meditation is for people engaged in the world – for people who have families, jobs, homes and things to do.

What kind of benefits will I get from meditating?

The deep levels of rest acquired by using this technique creates powerful, measurable changes in the physiology. Meditators have reported experiencing release of stress, more energy, clearer thinking, better health, and improved personal relationships. Here are some other notable benefits:

- Improved memory, energy, creativity, intelligence
- Relief from depression and anxiety
- Relief from migraines, headaches and asthma
- Relief from insomnia and other sleeping disorders
- Faster reaction times
- Reduced cholesterol levels
- Relief from fatigue
- Stronger immune system
- Reduced risk of heart disease
- Normalization of blood pressure
- Improved sports performance
- Reduction of biological aging
- Reduced addictive behaviors
- Normalization of weight

What if I have too many thoughts when I try to quiet my mind?

If you feel like your mind is always active, you are a perfect candidate for this technique because you don't have to "try" to stop thinking or "try" to do anything for that matter. "Trying" is actually what excites the mind and causes thinking. Vedic Meditation is designed to effortlessly de-excite the mind in the most natural and immediate way. Once the mind de-excites, you'll notice that thoughts spontaneously get fewer and fewer.

SEARCH

LATEST ENTRIES

- Intro to Meditation
- Beyond The Affair: How conscious awareness about your relationship can help you heal.
- Unity: Reflections on Self Evolution as Collective Evolution
- What is REIKI Healing?
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EXPLORING THE VEDA 1 at 12:00 am
FREE TALK: Intro to Meditation at 7:00 pm

Have these claims been proven by science?

Yes. Over 600 published scientific research studies verify and validate the benefits of Vedic Meditation in every area of an individual's life including: mind, body, behavior and environment.

How much time will it take to learn?

The Introduction to Meditation course takes place over 4 consecutive days, each class lasting approximately 90-minutes. By the end of the four days, you will be a completely self-sufficient meditator. For those who prefer on-going support, a lifetime of unlimited follow-up is available to all those who complete the course, and is guaranteed to you as a student of this practice. Private courses are also available upon request.

How long will it take until I feel benefits?

Immediately – you will feel benefits from the very first time you meditate. Many people report increased energy, increased calmness and greater clarity in the first weeks, and friends and family will often notice differences as well.

How much will it cost me to learn?

Course fees are determined based on a sliding scale and are determined by you according to your income. Payment plans which allow you to pay over time are also available and can be determined easily by you and the teacher. Of primary importance to us is to teach those who are ready to learn and will not let money be an issue that stands in the way of those who are ready. We are happy to work with you to help make a plan that works for you.

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San Diego
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Des Moines
515.309.1873

New York
917.623.9286

GIVE:

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Amazon Herb Co.

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